

July 14, 2023

**VIA ECF**

The Honorable Sarah L. Cave  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
Southern District of New York  
500 Pearl Street, Room 18A  
New York, NY 10007-1312

**Re: Joint Letter in *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC (S.D.N.Y.) – Letter Certifying Completion of Fact and Expert Discovery per Court Order (Dkt. 138) Pending CNN’s Letter-Motion (Dkt. 155)**

Dear Judge Cave:

Pursuant to the Court’s order (Dkt. 138), Plaintiffs Jack and Leslie Flynn (the “Plaintiffs”) and Defendant Cable News Network, Inc. (“CNN”) respectfully submit this joint letter certifying that all fact and expert discovery is complete, with the exception of CNN’s outstanding letter-motion pending at Dkt. 155. Neither party requests a settlement conference.

We thank the Court for its time and attention to this outstanding matter.

Dated: July 14, 2023

Respectfully submitted,

The Honorable Sarah L. Cave  
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